

UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION

UNITED STATES OF AMERICA)	
Plaintiff)	
)	
v.)	No. 08 CR 372
)	Title 18, United States Code,
EDWARD R. VELAZQUEZ)	Sections 1341, 1343, 2314 and 2.
Defendant)	

MOTION FOR EARLY RETURN OF SUBPOENAS
PURSUANT TO FEDERAL RULE OF CRIMINAL PROCEDURE 17(c)

Defendant Edward R. Velazquez, by his attorney James B. Koch, respectfully moves, pursuant to Federal Rule of Criminal Procedure 17 (c), for entry of an order permitting the early return of trial subpoenas and subpoenas *duces tecum* on behalf of defendant. In support of this motion, defendant states as follows:

1. Although the Court has yet to set a trial date in this matter, documentary evidence must be obtained by the defense in this case in its preparation for any pre-trial hearings that may be granted and witnesses will need to be subpoenaed. Additionally, given the a need to examine this evidence in advance of trial, defendant requests this Court grant its request for an early return of trial subpoenas.

WHEREFORE, Defendant Edward R. Velazquez respectfully requests that this Court enter an order allowing for early return of subpoenas,

James B. Koch
53 West Jackson Blvd, Suite 950
Chicago, Illinois 60604
Phone: 312-362-0000
Fax: 312-362-0440

Respectfully Submitted,
James B. Koch
James B. Koch
Attorney for Edward R. Velazquez